

ORIGINAL
IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION
2011 DEC -9 A 11: 20

UNITED STATES OF AMERICA
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA.
v.

RHASHEMA DERAMUS,
a/k/a Rhashema Shackelford

)
)
) CR. NO. 2:11-cr-198-MEF
)
)
) UNDER SEAL

UNOPPOSED MOTION TO SEAL CASE

Comes now the United States of America, by and through George L. Beck, Jr., United States Attorney for the Middle District of Alabama, and respectfully moves the Court to seal the case from the indictment returned on the Grand Jury Docket for November 9, 2011. As grounds therefore, the United States avers the following:

1. Under Fed.R.Cr.P. 6(e)(4) the “magistrate judge to whom an indictment is returned may direct that the indictment be kept secret until the defendant is in custody or has been released pending trial.” A United States Magistrate Judge is given great deference in deciding whether to grant a motion to seal an indictment and case. See United States v. Edwards, 777 F.2d 644, 648 (11th Cir. 1985).
2. The sealing of a case is proper “where the public interest requires it . . . or for other sound reasons of policy.” Id.
3. The public interest and other sound reasons of policy justify this Court’s sealing of the case from the indictment returned against the defendant.
4. The defendant is currently cooperating with the United States through proffering information and will possibly be conducting undercover operations. The United States requests that the instant indictment and the entire case, including all files and

documents associated with the case, be sealed to protect the ongoing investigation and help assure the safety of the defendant.


5. Public disclosure of this instant indictment and any document associated with it may severely harm the investigative efforts of the United States. Accordingly, the prosecutorial needs and objectives involving the ongoing investigative efforts warrant the sealing of the indictment and this case. See, e.g., United States v. Sharpe, 995 F.2d 49, 52 (5th Cir. 1993) (“An indictment is properly sealed when the government requests that the magistrate judge seal the indictment for any legitimate prosecutorial objective or where the public interest otherwise requires it.”) (internal citation and quotation omitted).

6. The defendant does not oppose the granting of this motion.

Wherefore, the United States thus moves this Court to seal the case pending further motion by the government.

Respectfully submitted this 9th day of December, 2011.

GEORGE L. BECK, JR.
UNITED STATES ATTORNEY


W. Brent Woodall
Assistant United States Attorney

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

UNITED STATES OF AMERICA

v.

RHASHEMA DERAMUS,
a/k/a Rhashema Shackelford

)
)
)
)
)
)

CR. NO. 2:11-cr-198-MEF

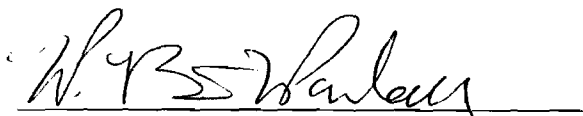
UNDER SEAL

CERTIFICATE OF SERVICE

I hereby certify that on December 9, 2011, I placed an envelope, with proper postage attached, containing a copy of the foregoing in a receptacle of the United States Postal Service addressed to:

Mr. Randy Bruce Maddox
6728 Taylor Court
Montgomery, AL 36117

GEORGE L. BECK, JR.
United States Attorney



W. Brent Woodall
Assistant United States Attorney
131 Clayton Street
Montgomery, AL 36104
Phone: (334) 223-7280/Fax: (334) 223-7135
E-mail: brent.woodall@usdoj.gov